

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**KATHERINE MONSON, individually and  
on behalf of all others similarly situated**

**Plaintiff,**

**v.**

**MCCLENNY, MOSELEY &  
ASSOCIATES; JAMES MCCLENNY;  
JOHN ZACHARY MOSELEY; TORT  
NETWORK, LLC; EQUAL ACCESS  
JUSTICE FUND LP; and EAJF ESQ  
FUND LP**

**Defendants.**

**Civil Action No. 4:23-cv-00928**

**DYKEMA’S NOTIFICATION PURSUANT TO COURT ORDER**

On October 7, 2024, attorneys David A. Schenck, Clay A. Cossé, and Alexandria Twiss, and their law firm, Dykema Gossett PLLC (collectively, “Dykema”) filed a motion to withdraw as counsel for Defendant Tort Network, LLC D/B/A Velawcity (“Velawcity”). On October 8, 2024, this Court ordered Dykema to provide notice to Velawcity that (1) a business association cannot appear in federal court *pro se* and thus must obtain other counsel; and (2) Velawcity’s failure to promptly obtain new counsel may result in the Court’s granting of a default judgment thereafter against it. Further, the Court ordered that Dykema provide a copy of its October 8<sup>th</sup> Order [Dkt. #104] to Velawcity.

On October 10, 2024 Dykema provided a copy of the Court’s Order to Defendant, Velawcity, via email correspondence. In this email, Dykema informed Velawcity that it cannot represent itself *pro se* in federal court and thus Velawcity must obtain other counsel. Dykema also informed Velawcity that failure to promptly obtain new counsel may result in the Court’s granting of a default judgement against Velawcity. A copy of this communication has been attached to this

Reply as Exhibit “A”. In response, Velawcity stated that it is currently seeking new counsel to represent it in this lawsuit.

**PRAYER**

WHEREFORE, Dykema has demonstrated good cause for entry of an order authorizing Dykema to withdraw as counsel for Velawcity immediately, and for such other relief as may be warranted under the circumstances.

Respectfully submitted,

By: /s/ David J. Schenck

David J. Schenck

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**ATTORNEYS FOR DEFENDANT  
TORT NETWORK LLC D/B/A VELAWCITY**

**CERTIFICATE OF SERVICE**

I hereby certify that on October 10, 2024, a true and correct copy of the foregoing was served on all counsel of record pursuant to the Federal Rules of Civil Procedure.

/s/ Alexandria Twiss  
Alexandria M. Twiss